

Division of Environment
Southeast District Office
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Lee A. Norman, M.D., Secretary

Laura Kelly, Governor

January 28, 2021

Gregg Klumper, General Manager
Jordan Disposal LLC
LLC, 1040 East Front Street
Galena, KS 66739

Gregg@Jordandisposal.com

Renee Charles, City Clerk
City of Galena, 211 West 7th Street
Galena, KS 66739

f.charles@galenaks.gov

Re: Request to use shredded railroad ties mixed with soil for intermediate cover at the City of Galena construction and demolition landfill, Permit 738, CK Co.

Dear Mr. Klumper and Ms. Charles:

I am writing to approve your request to use a 50:50 mixture of shredded railroad ties and soil for intermediate (2,000 tons of waste received or 120-day) cover at the City of Galena construction and demolition (C&D) landfill. Kansas Administrative Regulation (K.A.R.) 28-29-308(k)(3) states that "The alternative material shall consist of material acceptable for disposal in the C&D landfill..." Waste creosote treated railroad ties (CRTLs) can be disposed in a Kansas C&D landfill with studies cited by Hockensmith, Schlauch, et al (1994) and others determining that based on toxicity characteristic leaching procedure analysis CRTLs are not a hazardous waste. K.A.R. 28-29-325(a)(3)(D) requires that a C&D landfill's operating plan include procedures for screening incoming waste for non-C&D material, with K.A.R. 28-29-39-308(f)(9) allowing that waste screening to be at the point of generation if included in the operating plan. The city of Galena has submitted an operating plan modification that allows CRTL screening off site. A copy of that approved operating plan modification is attached.

The request to utilize shredded CRTLs in an alternative cover material is approved with the following conditions:

1. The ties are screened in accordance with the approved operating plan modification.
2. The soils and shredded ties are mixed prior to application.
3. If the shredded ties or soil-tie mixture is stockpiled prior to use, it must be stored in an area with run-off controls.
4. Consistent with the standard cover requirements in K.A.R 28-29-308(k), one foot of this cover material, soils, or a mixture of this cover material and other approved cover materials material will be applied every 120 days, or 2,000 tons of waste received, whichever occurs first, with cover application not required more frequently than weekly.
5. Landfill employees must record the alternative cover use dates in the facility's operating log.

Greg, Klumper, General Manager

January 28, 2021

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Permission to use alternative cover may be rescinded or amended if the requirements in K.A.R. 28-29-308(k)(2) to limit air intrusion, control litter, and limit vector harborage are not met, or if rescinding this authorization is necessary to prevent nuisance conditions or adverse impacts to human health and/or the environment.

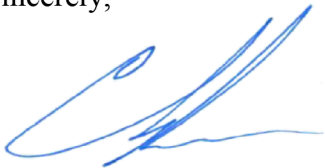
This approval is considered a minor modification pursuant to General Condition 4(b) in Permit 738. Please amend the operations plan for this facility consistent with your request and this approval. One way to accomplish this would be to insert copies of this approval letter and the approved operating plan modification into the previously approved operations plan. By copy of this letter, the amendment is being forwarded to KDHE's Topeka and district offices for their reference and files.

This authorization to use alternative cover does not release the permittee from conformance with other requirements set forth in the state solid waste regulations and permit conditions.

The Bureau of Waste Management is attempting to go as paperless as practically possible. Therefore, this approval is only being transmitted by e-mail.

Jordan Disposal LLC's and the City of Galena's cooperation with the Kansas solid waste program is appreciated. If you have questions regarding this letter, please contact me at 620-860-7242 (direct) or 620-431-2390, or by e-mail to charles.bowers@ks.gov.

Sincerely,



Charles. Bowers, P.E.
Bureau of Waste Management, Chanute

Cited Reference

Hockensmith, E. H., M. B. Schlauch, and C. P. L. Barkan, 1994, R-861, "A Review of Toxicity Characteristic Leaching Procedure Testing of Railroad Crossties", Research and Test Department, Washington Systems Center, Association of American Railroads, 33 pages plus appendices

cc: Doug Cole, BWM, Chanute → SEDO Waste Staff → SEDO File: SW, CK, CDL, 738
Mindy Bowman, BWM, Topeka → Mike Selm → ImageNow: Drawer, Solid Waste; Document Type, Operating Plan; Permit #738; Subject, CTRT Alternative Cover Approval Mindy.Bowman@ks.gov

12/15/2020

**City of Galena Construction and Demolition Landfill, Permit 738
Operating Plan Modification to Use Shredded Railroad Ties Mixed with Soil for
Alternative Cover**

Request for operating plan modification to include using shredded railroad ties as alternate cover. Anticipated 2000 – 3000 ties per month screened off site by landfill personnel with the screening recorded, and the ties shredded off site (within 500 yards of the landfill). Shredded ties will be stored on Jordan Disposal property adjacent to the City of Galena Landfill (within the landfill complex). Storage area is surrounded by a 3-foot berm. A water truck and mobile sprinkler system will be used as dust control on and around the storage area.

Shredded ties will be mixed 50:50 with soil when needed to cover 2000 tons or every 120 days.

**STATE OF KANSAS
DEPT. OF HEALTH & ENVIRONMENT
APPROVED
DIVISION OF ENVIRONMENT**


ENGINEER
**JAN 28, 2021
TOPEKA, KANSAS**